

TO: OSS Work Group
From: Betsy Howe, Founder
Citizens Opposed to OSS Management Washington
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Re: Public Input to DRAFT Proposal
Date: August 23, 2016

Our volunteers have reviewed the DRAFT proposal. We ask that our "public input" be distributed to all members of the Work Group. In addition to the attachments, comments include the following concerns:

Thurston County Model

The 2014 Plan in Thurston County has not been approved by the Board of Health. After several public meetings, the proposal has not been well received. The plan does not reference the primary source of pollution, Combined Sewer Overflow from the LOTT Utility.

OSS "failures" recorded by the County do not separate data for total system failures and maintenance issues that can be easily repaired. Therefore OSS "failure" data is useless.

Dye testing has been helpful at shorelines, but is not an appropriate test to identify pollution beyond the shoreline. DNA testing has been compromised by CSOs and leaking sewer lines.

The proposal has not provided scientific justification for increased testing, monitoring or system upgrade.

Educational Programs

There is no lack of educational material regarding OSS. The most effective information is provided by the manufacturer and installer of OSS.

Community education materials provided by KingCounty/healthservices/health/ehs/ wastewater to Auburn Magazine fail to show the biological agents in the Septic Tank, leaving the impression that waste is not broken down in any way prior to entering the leach field.

The coversheet of this DRAFT document uses arrows to demonstrate the "flow" of waste into the ground water, nearing the aquifer for drinking wells. The implication is that OSS contaminate drinking water.

This is not education, but mis-information.

Testing for Pollution

The DRAFT offers no specific test data to indicate that OSS pollute. Straight line drainage does not constitute an OSS, therefore, data related to pollution coming from straight-line drainage should not be included in OSS statistics.

DNA testing to find pollution sources cannot be directly related to OSS unless all other options are eliminated such as Biosolid fertilizers, sewer leakage, dumping of untreated waste and CSOs.

References to study areas do not include Juanita Creek in the Kirkland area. Department of Natural Resources and Parks, supervised studies of several pollution testing medium. No OSS pollution was found in the area that is considered a "high risk area".

City of Kirkland Surface Water Management utilized DNA testing for pollution. OSS were not found to be contributing to pollution. Instead, typical sources of contamination were leaking sewers from North Shore Utility sewer lines under the lake and sewage dumping from boats.

Actual scientific data argues the point made on pages 19-20 of the DRAFT, *"There are no currently known water recreation facilities or swimming areas that are being impacted by OSS in King County.... King County does not have any known wetland areas used for the production of crops for human consumption which might be impacted by OSS."*

Without scientific justification for government oversight or interference, we respectfully reject the recommendations of this DRAFT proposal. We hope the staff will continue to seek input from the Work Group and the public as originally scheduled through the end of October to create a more agreeable document.